

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: REVOLUTION MONITORING, LLC <i>et al.</i> Debtor.	§ § § § § §	CHAPTER 11 CASE NO. 18-33730-HDH
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**LIBERTY MUTUAL INSURANCE COMPANY’S OBJECTION TO MOTION OF
LIQUIDATING TRUSTEE FOR RULE 2004 EXAMINATION**

Liberty Mutual Insurance Company (“Liberty”) files its Objection to the Motion of Liquidating Trustee for Rule 2004 Examination (the “Motion”) [Dkt #147], and respectfully states as follows:

I.
OBJECTIONS

1. The Trustee has failed to comply with the procedural requirements of L.B.R. 2004-1. Specifically, L.B.R. 2004-1 requires that a party moving for examinations pursuant to Rule 2004 confer with the proposed examinee or its counsel prior to filing.

2. The Motion does not establish how the information the Trustee seeks through a Rule 2004 examination relates to the “acts, conduct, or property or to the liabilities and financial condition of the debtor” affecting the administration of the estate. *See* Fed. R. Bankr. P. 2004.

3. The Motion and attached subpoena requests are overly broad and place an unreasonable burden on Liberty.

4. Production of the requested documents would violate the Health Insurance Portability and Accountability Act (“HIPAA”) Standards for privacy of Individually Identifiable Health Information.

5. The Trustee has not shown how the requested documents are relevant and necessary to the administration of the estate.

6. Liberty further incorporates by reference the arguments contained in the objections filed by all other objecting entities as if asserted in full herein. *See* Fed. R. Bankr. P. 7010; Fed. R. Civ. P. 10(c).

II. **PRAYER**

Based on the foregoing, Liberty respectfully requests that the Court deny the Motion, and grant Liberty such other relief that the Court deems just and proper.

Respectfully submitted,

/s/ Mark D. Tillman

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**ATTORNEYS FOR LIBERTY MUTUAL
INSURANCE COMPANY**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 11, 2019, a copy of the foregoing was served on all counsel of record herein by the Court's ECF notification system.

/s/ Mark D. Tillman

MARK TILLMAN